

U.S. Department of Justice



United States Attorney
Southern District of New York

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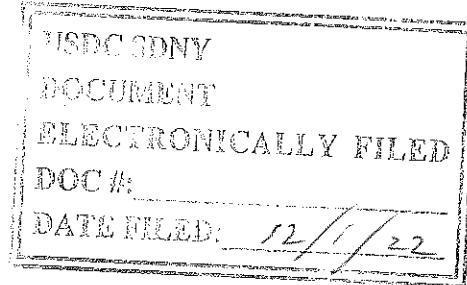
November 23, 2022

MEMO ENDORSED

BY CM/ECF

Honorable Lewis A. Kaplan
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: **United States v. Otis Parkes**
Docket No. 03 Cr. 1364 (LAK)



Dear Judge Kaplan:

The Government respectfully writes to request 60 days to respond to defendant Otis Parkes's motion to vacate, dated November 23, 2022 (the "Motion"). The defendant argues in the Motion to Vacate that he is entitled to relief on his successive Section 2255 motion because of the Supreme Court's decisions in *United States v. Davis*, 139 S. Ct. 2339 (2019), and *United States v. Taylor*, 142 S. Ct. 2015 (2022). The Government opposes the Motion. The undersigned respectfully requests 60 days to respond due to an anticipated three to four week trial in *United States v. Constantine, et al.*, 21 Cr. 530 (SHS) set to commence on November 28, 2022.

Respectfully submitted,

DAMIAN WILLIAMS
United States Attorney
Southern District of New York

/s/ Danielle M. Kudla
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cc: Daniel Habib, Esq. (by ECF)

SO ORDERED
LEWIS A. KAPLAN, USDI
12/1/22